

## REMARKS/ARGUMENTS

### OBJECTIONS TO THE SPECIFICATION AND DRAWINGS

Application paragraph [0015] is amended in accordance with paragraph 2.a of the pending office action.

Applicant submits that the parenthetical phrase “(not shown in the Figures)” in application paragraph [0025], which is objected to in office action paragraph 2.b, is correct without amendment. In this regard, the parenthetical phrase refers to “the overall *left side* inboard contact surface 41,” which is, indeed, not shown in the figures (even though the “overall *right side* inboard contact surface 41” is described later in the paragraph and shown in Figure 1). (italics added). Because Figure 1 shows only the *right side* inboard contact surface – not the left side – Applicants submit that the text of paragraph [0025] is correct. If, however, the Examiner determines that some additional amendment to the specification is required to clarify the disclosure, Applicants will make an appropriate amendment.

The office action at paragraph 2.c correctly objects to reference numeral “82” in application paragraph [0032] with respect to Figures 3 and 4. Applicants obviate this error by correcting the use of reference numerals “82” and “84” in Figures 3 and 4. Specifically, reference numeral “84” is changed to “82” in Figures 3 and 4, and reference numeral “82” is changed to “84” in Figure 4. Also, reference numeral “80” is eliminated from Figure 3 for clarity. The enclosed drawings are also amended to overcome the drawing objections relating to non-standard lettering and non-uniform line thicknesses.

### OBJECTIONS AND REJECTIONS TO THE CLAIMS

#### Objections and Section 112 Rejections

The claims are amended to overcome the objections and Section 112 rejections to the claims. In particular, in claim 1 the term “[latch]” is replaced with the term “latch” (that is, without brackets) and proper antecedent basis for the term “connector” is provided in lines 15 and 16-17 in accordance with paragraph 5.a of the office action. Line 5 of claim 1 is amended to recite “a pair of opposing side frame portions disposed proximate opposing ends of the transverse frame portions” rather than incorporating the amendment proposed in office

action paragraph 3.b in order to prevent any uncertainty regarding the meaning of the phrase. Line 16 of claim 1 has not been amended because the noun “longitudinally opposing undercut surfaces,” which was objected to in office action paragraph 5.b, has antecedent basis in line 14. The term “surface” is amended to “surfaces” in line 16 of claim 1 in order to make it agree with its plural antecedent in accordance with the amendment of line 12 of claim 1.

Claim 5 is amended in accordance with paragraph 3.c by inserting the words “of the.” Claim 8 is amended in accordance with paragraph 5.c and also to correct a minor grammatical or typographical error. The term “latch” is added before the term “assembly” to correspond the recitation of that term in claim 1. Claim 9 is amended in accordance with paragraph 3.d by changing the term “column” to “frame.” Claim 17 is amended to recite the term “opposing frame,” which has antecedent basis, in accordance with paragraph 5.d.

None of the above amendments narrow a limitation of any claim.

#### Section 102 and 103 Rejections

Claims 1-21 have been rejected under Section 102 based on United States Patent Number 5,398,295 (“Chang”). Independent claim 13 has also been rejected under Section 102 based on each of United States Patent Number 6,095,852 (“Gregory 852”), United States Patent Number 6,033,247 (“Gregory 247”), and United States Patent Number 6,210,216 (“Tso-Chin”). Claims 14 and 15 have also been rejected under Section 102 based on Tso-Chin.

Claim 1 is also amended to clarify its scope by reciting “a pair of . . . undercut portions” to agree (in plurality) with the phrase “opposing contact surfaces” in line 16 and by expressly reciting “the through apertures defining a longitudinal axis.” Claim 1 is also amended to include the term “longitudinally” before the phrase “opposing undercut contact surfaces.” Because claim 1 recites the “undercut portions” are “formed at least partly on . . . the transverse frame portions” and the “undercut portions” include the “contact surfaces,” the “opposing undercut surfaces” would be construed to be longitudinally opposing even without this amendment. Accordingly, the amendments to claim 1 do not narrow the scope of any limitation, but rather are merely for clarification. Similarly, the amendments to claim 16 providing proper antecedent basis and subject-verb agreement do not narrow the scope of any limitation.

Claims 13 is amended to recite that “the front and rear contact surfaces” are “disposed on exterior and outwardly facing portions of the frame assembly” and claim 16 is amended to recite that “the undercut portion” is “disposed on an exterior and outwardly facing portion of the frame assembly.”

New claims 22-27 are added.

Rejection of Claims 1-12 and 16-21

Applicants request reconsideration of the Section 102 rejections based on Chang, as Chang neither teaches nor suggests limitations of independent claims 1 and 16.

In this regard, Chang’s clip has a pair of substantially *transverse-facing* “tapered sections 16A, 18A, 26A and 28A on the front portion and shoulder or converging sections 16B, 18B, 26B, and 28B on the rear portion, respectively,” *disposed entirely within its housing 12*. (Chang, col. 3, lns 15-19 & Figure 1). The connector that is received into housing 12 has a converging section 54 forming a shoulder (not numbered) on the connector. “[T]he rear section 58 of the connector 50 loaded in the first cavity 22 is naturally sandwiched between the rear wall 30 and the shoulder sections 16(B) of the left side wall 16 and the shoulder section 26(B) of the auxiliary wall (26). . . . Thus, the connectors 50 in the cavit[y] 22 . . . can not move with regard to the bottom half in the front-to-end or lengthwise direction.” (Chang, col. 3, lns. 48-59). Accordingly, the shoulder (e.g. 16B) and tapered sections (e.g. 16A) of the clip, which prevent lengthwise movement of connector, are oriented substantially transversely and are disposed entirely within the housing 12.

Thus, Chang neither teaches nor suggests “a pair of longitudinally opposing undercut portions formed at least partly on at least one of the transverse frame portions, the undercut portions including longitudinally opposing undercut contact surfaces adapted for contacting a lip portion of the connector,” as recited in Applicants’ claim 1. For example, Chang’s tapered section and shoulder 16A & 16B substantially transversely oppose corresponding tapered section and shoulder 26A & 26B, as distinguished from being “longitudinally opposing.”

Furthermore, Chang neither teaches nor suggests “the undercut portion disposed on an exterior and outwardly facing portion of the frame assembly and including an undercut contact surface adapted for contacting a lip portion of the connector,” as recited in Applicants’ claim 16. For example, Chang’s tapered section and shoulder 16A and 16B are disposed neither “on an exterior . . . of the frame assembly” nor “on an outwardly facing portion” of the frame assembly.

Also, new claims 22 and 25 recite “the undercut is a portion of the transverse member having a smaller longitudinal dimension than that of the side members” which is neither taught nor suggested by Chang. Other dependent claims recite subject matter that is patentably distinguishable over Chang, but such arguments are unnecessary considering the arguments relating to independent claims 1 and 16.

#### Rejection of Claims 13-15

Applicants request reconsideration of the rejection of independent claim 13 and dependent claims 14 and 15 based on Chang, Gregory 852, Gregory 247, and Tso-Chin.

As described more fully above, Chang neither teaches nor suggests, inter alia, “a pair of opposing front and rear face contact surfaces disposed on exterior and outwardly facing portions of the frame assembly” such that “the front and rear face contact surfaces restrict[] movement of the connectors in a direction along a connector longitudinal axis,” as recited in Applicants’ claim 13. Rather, any structure that could correspond to that “restricting movement . . . along a connector longitudinal axis” is neither “disposed on exterior . . . facing portions” nor “disposed on outwardly facing portions” of the frame assembly.

Neither Gregory 852 nor Gregory 247 teach or suggests “the frame assembly including inboard contact surfaces and a pair of opposing front and rear face contact surfaces disposed on exterior and outwardly facing portions of the frame assembly, the front and rear face contact surfaces restricting movement of the connectors in a direction along a connector longitudinal axis,” as recited in Applicants’ claim 13.

Rather, Gregory 852 shows, for example, a “contact plate 44” that is *internal* to bracket 12 and stop walls 28 that are *inwardly-facing*. Gregory 247 shows, for example, support tabs 27 and 58, which are *internal* to the mounting structure.

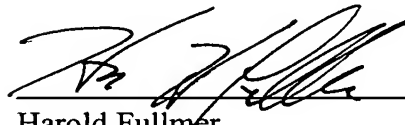
It is unclear how Tso-Chin teaches anything at all about a clip having a "frame assembly including inboard contact surfaces and a pair of opposing front and rear face contact surfaces disposed on exterior and outwardly facing portions of the frame assembly" or one in which "the front and rear face contact surfaces restricting movement of the connectors in a direction along a connector longitudinal axis" or other limitations of claim 13. In fact, the portion cited to disclose limitations relating to the "front and rear contact surfaces" (Office Action, 08/06/03, para. 9, lines 2-4), is directed to the fasteners 26 that holds the casing 16 to a panel 28, rather than structure recited in claim 13.

Moreover, Applicants add new claims 26 and 27 reciting the "contact surfaces" are capable of contact or indeed contact the connector, which structure is further distinguishable over Tso-Chin. If the examiner has additional grounds for rejecting amended claim 13 and its dependent claims based on Tso-Chin or determines to continue to base the rejection on Tso-Chin, Applicants request additional explanation of the grounds in order to prepare an appropriate response.

### **CONCLUSION**

Considering the arguments and amendments submitted herein, Applicants request reconsideration of the pending objections and rejections. If the Examiner determines that a telephone conference would further prosecution of this case, he is invited to telephone the undersigned at his convenience.

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Harold Fullmer  
Registration No. 42,560

Woodcock Washburn LLP  
One Liberty Place - 46th Floor  
Philadelphia PA 19103  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439